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6 Attorneys for Plaintiff
7 United States of America

8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA,

11 CASE NO. S-96-00350-WBS

12 Plaintiff,

13 GOVERNMENT'S THIRD MOTION FOR
14 EXTENSION OF TIME TO RESPOND
15 TO ORDER TO SHOW CAUSE

v.

16 PING SHERRY CHAN,

17 Defendant.

18 The United States of America, through its counsel of record, William S. Wong, Assistant United
19 States Attorney, hereby respectfully requests an extension of time to respond to the Court's Order to
Show Cause.

20 The court originally set February 18, 2014 to respond to its order. The government requested an
21 extension of time to April 19, 2014 and then a second extension to June 19, 2014 to file its response.
22 For the reasons previously stated, the government needed additional time to resolve the charges
23 contained in the indictment captioned United States America v. Ping Sherry Chan, CRS 96 – 350 WBS.
24 During this 60 day extension, the government was successful in achieving a resolution of the charges
25 against defendants Mady Chan, Linda Chan, Bao Gin Chen, Lizhen Chen, and Jimmy Leung. The
26 remaining defendants in this case all fall under the category of family members/close friends related to
27 defendant John That Luong. Defendant John That Luong is presently serving a life sentence, plus 65

1 years in a federal prison on the East Coast. The Stipulation for Consent, Judgment of Forfeiture has
2 been emailed to John That Luong's counsel, Dan Koukol, Esq. An offer to resolve the entire case is
3 forth coming. Because the defendant is housed in a Bureau of Prisons facility on the east coast, this
4 presents a logistic problem in attempting to resolve the remaining defendants in this case, the
5 government respectfully requests an additional 90 days to September 19, 2014, to resolve the charges
6 pending against the remaining defendants in this case without having to utilize government resources
7 and time necessary to adequately respond to the court's inquiry (which will require conducting research
8 and ordering transcripts of court proceedings that relate to the issue of waiver of speedy trial).

9 The government believes that with this additional extension, a resolution of the entire money
10 laundering case is a good possibility. Accordingly, the government respectfully requests that it be
11 allowed additional 90 days to September 19, 2014 to file its response to the Court's Order to Show
12 Cause.

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14 Dated: June 19, 2014

BENJAMIN B. WAGNER
United States Attorney

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16 /s/ William S. Wong
WILLIAM S. WONG
17 Assistant United States Attorney
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14 IN THE UNITED STATES DISTRICT COURT
15 EASTERN DISTRICT OF CALIFORNIA

16 UNITED STATES OF AMERICA,

CASE NO. S-96-00350-WBS

17 Plaintiff,

18 v.
19 ORDER GRANTING GOVERNMENT'S THIRD
20 REQUEST FOR EXTENSION OF TIME TO RESPOND
21 TO COURT'S ORDER TO SHOW CAUSE
22

PING SHERRY CHAN,

Defendant.

23
24 Good cause having been shown, IT IS HEREBY ORDERED that the Government's request for an
extension of time to respond to the Court's Order to Show Cause IS GRANTED. The government shall file its
response no later than September 19, 2014. The court does not intend to grant any further extensions.

Dated: June 24, 2014


25 WILLIAM B. SHUBB
26 UNITED STATES DISTRICT JUDGE
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